

Exhibit 16

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHADEESHA BROWN and GABRIEL PEREZ,

Plaintiffs,

-against-

Index No.

11 CIV. 1068 (PKC)

THE CITY OF NEW YORK, BRIAN MCALEAR,
KEITH HOCKADAY, FREDERICO MARTINEZ,
JOAQUIN MORALES, ROBERT DOWNES,
THOMAS ALBANO, GERARD FLOOD,
WILLIAM HART, TIMOTHY MURPHY,
KEYNYETTA ROUSE and THOMAS LONGA,

Defendants.

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Michelstein & Associates
485 Madison Avenue
New York, New York 10022
March 6, 2012
10:19 A.M.

EXAMINATION BEFORE TRIAL of JOAQUIN MORALES, a
Defendant held at the above time and place pursuant to
Order, taken before, ASHLEY COHEN a Notary Public of the
State of New York.